

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 01-0662

**Direct Testimony of Chris Nations
On Behalf of Ameritech Illinois**

Ameritech Illinois Exhibit 9.0

January 28, 2002

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DIRECT TESTIMONY OF CHRIS NATIONS

ON BEHALF OF AMERITECH ILLINOIS

I. INTRODUCTION AND PURPOSE OF TESTIMONY

Q. Please state your name, title, and business address.

A. My name is Chris Nations. I am Area Manager – Regulatory –Operator Services. My business address is One SBC Plaza, Room 3440.13, Dallas, Texas 75202.

Q. Please describe your current job responsibilities?

A. In this position, I am responsible for representing Ameritech Illinois' Operator Services organization before regulatory bodies and other external stakeholders. I also assist these organizations in meeting all legal and regulatory requirements relating to Operator and Directory Assistance Services provided by Ameritech Illinois.

Q. Please describe your background.

A. I attended the University of Central Arkansas in Conway, Arkansas, where I earned a BA degree in Mass Communications and Marketing in 1994. While working for the Company, I have attended a number of seminars and other training sponsored by SBC Communications, Inc. ("SBC"), and other industry organizations on various management subjects. I began my career with SBC in 1996. I have held account management and product management positions in Southwestern Bell Wireless and Southwestern Bell Telephone. From May 2000 to January 2002, I was employed by SBC Telecom, SBC's out-region CLEC subsidiary. During that time I was responsible for SBC Telecom's

interconnection agreements with ILECs outside the SBC operating territory. I began my current assignment as Area Manager – Regulatory - Operator Services, February 1, 2002.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to demonstrate that Ameritech Illinois is in compliance with the requirements to provide nondiscriminatory access to directory assistance services to allow the other carrier's customers to obtain telephone numbers, operator call completion services as required by sections 251(b)(3) and 271(c)(2)(B)(vii)(II) and (III) of the Federal Telecommunications Act of 1996 ("Act"). A detailed discussion of the Company's compliance is contained in my affidavit, attached as Schedule CN-1 to my testimony. I will also address certain issues relating to my affidavit which arose during industry workshops held in this proceeding.

II. BRANDING OF OPERATOR AND DIRECTORY ASSISTANCE SERVICES

Q. During industry workshops in this proceeding certain parties complained that it takes five business days from the time a customer has migrated its service to a CLEC before the customer's OS/DA service is properly branded in the CLEC's name. As an initial matter can you explain what is branding for Operator and Directory Assistance services?

A. As explained in more detail in paragraph 25 of my initial affidavit attached as Schedule CN-1, Ameritech Illinois provides the capability to brand CLEC subscribers' OS/DA calls in the CLEC's name, before the call is answered by an operator, when the CLEC chooses Ameritech Illinois to provide those wholesale services. Thus, when a CLEC

subscriber dials “zero” for operator services or “411” for directory assistance, the caller will hear the name of his or her local exchange carrier, if the CLEC has subscribed to Ameritech Illinois’ wholesale branding service. This branding capability is identical to branding Ameritech Illinois provides to itself for its retail subscribers.

Q: Can you explain how Ameritech Illinois brands OS/DA calls in the name of a CLEC, even though Ameritech Illinois’ own operators handle the call?

A. As I detailed in paragraph 25 of my initial affidavit attached as Schedule CN-1, Ameritech Illinois offers to brand CLEC subscribers’ OS and DA calls with the name of their local exchange provider. The ability to brand CLEC subscribers’ calls with CLEC-specific names is provided both to switch-based carriers as well as resale and UNE-based CLECs using Ameritech Illinois’ unbundled local switching. Ameritech Illinois brands CLEC subscribers’ calls with CLEC-specific information, in the same manner that it brands its own subscribers’ calls. Ameritech Illinois uses the same 271-compliant process used by Southwestern Bell Telephone (“SWBT”) and approved by the FCC in 271 proceedings for Texas, Kansas, Oklahoma, Missouri and Arkansas. As noted in my affidavit, when a switch-based CLEC selects Ameritech Illinois to provide wholesale OS and/or DA services on the CLEC’s behalf, calls initiated by the CLEC’s subscriber are routed to Ameritech Illinois’ operator platform via dedicated trunks. Branding of OS and DA calls coming to Ameritech Illinois’ operator switch via dedicated trunks has long been available.

Q. Is branding of OS/DA services also available on CLECs' resale and UNE-P OS/DA calls coming to Ameritech Illinois over shared trunks?

A. Yes. In 2000,¹ Ameritech Illinois deployed the capability to provide CLEC-specific branding of OS and DA calls for CLECs that compete by reselling Ameritech Illinois' service, or by obtaining access to Ameritech Illinois' unbundled network elements. OS and DA calls from resale and UNE-based CLECs' subscribers arrive at Ameritech Illinois' operator platform from Ameritech Illinois' end office (dial tone) switches via shared trunks, just as Ameritech Illinois' retail subscribers calls are routed. Ameritech Illinois deployed technology that would allow the operator platform to determine which local exchange carrier served a specific subscriber when an OS or DA call arrived at the Ameritech Illinois operator switch from a shared trunk.

Q. How do you respond to comments that it takes five business days from the time a customer has migrated its service to the CLEC before the customer's OS/DA service is branded in the new local exchange carrier's name?

¹ Accessible Letter CLECAM00-074, issued August 1, 2000, details the capability that Ameritech Illinois developed and deployed to brand a CLEC's OS/DA calls that come to Ameritech Illinois's platform over shared trunks (i.e. calls that originate on Ameritech Illinois's end office switches and are routed to Ameritech Illinois's operator platform on the same trunks as calls from Ameritech Illinois's retail customers).

85 A. The concern about a possible five-day interval to change branding is based on old
86 information and is no longer relevant. In the fourth quarter 2001, Ameritech Illinois
87 further refined its OS/DA branding capability to utilize information in the Line
88 Information Database (“LIDB”) to trigger OS/DA branding. Ameritech Illinois utilizes
89 LIDB’s Originating Line Number Screening (“OLNS”) capability to determine which
90 local exchange carrier serves the caller -- a change that is transparent to CLECs as well as
91 Ameritech Illinois’ subscribers. Ameritech Illinois is utilizing OLNS to obtain carrier-
92 specific designation for OS/DA calls from Ameritech Illinois and CLEC subscribers
93 whose calls are routed from Ameritech Illinois’s end office switches to Ameritech
94 Illinois’s operator platform.² Whatever the interval between migration and changes in
95 carrier-specific branding, however, the CLEC concerns are of no competitive
96 significance. OS/DA branding changes triggered by a subscriber’s migration from one
97 local exchange carrier to another are the same for Ameritech Illinois subscribers and
98 CLEC subscribers.

99
100 **Q. Is this OS/DA branding process any different from when a subscriber migrates local**
101 **exchange service from a CLEC to Ameritech Illinois?**

² Prior to the recent refinement of the OS/DA branding process, the possible interval to change branding was up to five days using a table populated with per-subscriber-line carrier information. However, the interval generally was much shorter. Since the table update was downstream from the migration process, there was a period of time before a subscriber’s carrier OS and DA branding was changed to its new local service provider. This was as true for Ameritech to CLEC migrations as it was for CLEC to Ameritech migrations. Now Ameritech’s operator platform obtains carrier-specific information from the LIDB database to trigger OS/DA branding. LIDB is updated more quickly than the table initially utilized to trigger OS/DA branding.

102 A. No, the process is the same, implemented in the same timeframe. With information from
103 LIDB that is specific to which local exchange carrier serves the calling telephone line,
104 Ameritech Illinois' operator switch "plays" the CLEC-specific or Ameritech Illinois
105 brand.³ Thus, subscribers of resale and UNE-based CLECs' local exchange service, as
106 well as Ameritech Illinois' retail subscribers, can hear their carrier-specific brands after
107 dialing "zero" for operator services or "411" for directory assistance. Ameritech Illinois
108 uses the same 271-compliant process used by SWBT for its CLEC customers. As in
109 SWBT states, the OS/DA branding process in Ameritech Illinois is dependent upon
110 completion and posting of service orders to migrate local exchange service from one
111 provider to another. After the service order migration information flows through
112 Ameritech Illinois' operations support systems and is completed and posted, the new
113 carrier information flows down to LIDB. The process is the same whether a subscriber
114 migrates from Ameritech Illinois to a CLEC's local exchange service or from a CLEC to
115 Ameritech Illinois' local exchange service. The most important point is that all callers to
116 Ameritech Illinois' operator platform are treated the same, regardless of the subscriber's
117 local exchange carrier. Subsequent to service order completion and posting, any
118 branding change interval resulting from migration of a subscriber from Ameritech
119 Illinois' local exchange service to a CLEC's resold or UNE-based local exchange service
120 is the same as when a CLEC subscriber migrates to Ameritech Illinois' local exchange

³ A CLEC's brand is "played" when the CLEC has subscribed to Ameritech Illinois' OS/DA wholesale branding offer.

service.⁴ Branding of OS and DA calls handled by Ameritech Illinois is provided on a nondiscriminatory parity basis.

III. CLEC VERIFICATION CAPABILITIES FOR LISTINGS USED IN AMERITECH'S DIRECTORY ASSISTANCE DA DATABASE.

Q. Another issue that came up at the industry workshop was whether Ameritech Illinois provides CLECs the capability to verify the presence and accuracy of their subscribers' directory listings. Is there such a process?

A. Yes. Ameritech Illinois provides CLECs the capability to verify their listings used in Ameritech Illinois' DA database. Both Ameritech Illinois' subscriber listings and CLEC subscriber listings in Ameritech Illinois' DA database flow from the White Page ("WP") database. As detailed in the testimony of Robben Kniffen-Rusu, Ameritech Illinois CLECs have the capability to verify the presence and accuracy of their respective subscribers' listings in the WP database, which then flow to Ameritech Illinois' DA database. To the extent that a CLEC chooses to use the listing verification tools available to it, the CLEC has the capability to verify the presence and accuracy of its subscribers' listings, both in the WP database and in the downstream DA database.

⁴ A CLEC might inaccurately argue that customer confusion results during any interval between carrier-to-carrier migration and changes in branding. However, most subscribers rarely use Operator or Directory Assistance services on a daily basis, so it would be unreasonable to conclude that customer confusion results during a short migration interval.

139 **Q. Has the capability to verify CLEC directory listings been approved elsewhere?**

140 A. Yes. The ability to verify listings in the WP database, which “feeds” the DA database,
141 was approved by the FCC in SWBT’s section 271 proceedings for Texas, Oklahoma,
142 Kansas, Arkansas and Missouri. Ameritech Illinois provides CLECs a listing verification
143 process that is also 271-compliant.

144

145 **IV. CONCLUSION**

146 **Q. Does Ameritech Illinois fulfill its obligations under sections 251(b)(3) and**
147 **271(c)(2)(B)(vii)(II) and (III) of the Act?**

148 A. Yes. Ameritech Illinois provides CLECs nondiscriminatory access to its OS and DA
149 services and includes CLECs’ listings in its DA database on the same basis it does for
150 Ameritech Illinois’ retail subscribers.

151

152 **Q. Does this conclude your direct testimony?**

153 A. Yes.